

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

JOSE M. LORIE VELASCO, et al

Plaintiffs

v

KMART CORPORATION, et al

Defendants

CIVIL NO.: 1998-1867 (PG)

**MOTION REQUESTING TRANSFER OF STATUS CONFERENCE  
SET FOR JANUARY 20, 2005**

TO THE HONORABLE COURT:

COMES NOW Defendant Kmart Corporation ("Kmart"), represented by the undersigned attorneys, and respectfully informs as follows:

1. A status conference has been set for January 20, 2005 at 8:45 am in the case at bar. Nevertheless, the undersigned counsel has a conflicting previously scheduled pre-trial in the state court case Esmeralda Audiffred v. Ashford Presbyterian Community Hospital, Civil No. 02-1001 (502), which is set for 9:00 am.

2. For the foregoing reason, it is hereby respectfully requested that this Honorable Court enters an order transferring the status conference to the next available date in its calendar.

WHEREFORE, it is respectfully requested from this Honorable Court it takes notice of the above, and consequently transfers the status conference set for January 20, 2005 to the next available date in its calendar.

RESPECTFULLY SUBMITTED.

IT IS HEREBY CERTIFIED that on December 30, 2004, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: **José Quetglas Jordán, Esq.**, Quetglas Law Office, P.O. Box 16606, San Juan, Puerto Rico, 00907-6606.

In San Juan, Puerto Rico, this 30<sup>th</sup> day of December 2004.

Attorneys for Defendant Kmart Corporation  
SÁNCHEZ BETANCES, SIFRE, MUÑOZ NOYA &  
RIVERA, P.S.C.  
P.O. BOX 195055  
SAN JUAN, PUERTO RICO, 00919-5055  
Phone: (787) 756-7880  
Fax No. (787) 753-6580  
[mvila@sbslaw.com](mailto:mvila@sbslaw.com)  
[mvila@sbsmnr.com](mailto:mvila@sbsmnr.com)

s/Marta E.Vila Baez  
MARTA E. VILA BAEZ  
USDC NO. 218111

H:\550.000\550-298\MOTIONS\021MOTIONREQUESTINGTRANSFEROFSTATUSCONFERENCE.wpd